

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO.: 1:21CR0123
)	
Plaintiff,)	JUDGE JOHN R. ADAMS
)	
v.)	
)	
KENNETH JOHNSON, and)	<u>JOINT MOTION TO MODIFY</u>
GARNELL JAMISON,)	<u>CONDITIONS OF RELEASE</u>
)	
Defendants.)	

Now come Defendant Kenneth Johnson, by and through counsel Myron P. Watson; Defendant Garnell Jamison, by and through counsel Regis E. McGann; and the United States of America, by and through Bridget M. Brennan, Acting United States Attorney, and Justin Seabury Gould and Megan R. Miller, Assistant United States Attorneys, and jointly move this Court for an order modifying its orders setting conditions of release (Doc. 16: Terms of Johnson's Release; and Doc. 17: Terms of Jamison's Release).

The Court has ordered Jamison and Johnson ("Defendants") to "avoid all contact, directly or indirectly, with any person who is or may be a victim or witness in the investigation or prosecution" and to "avoid all contact, directly or indirectly, with codefendants." (*Id.*). Johnson is a Councilperson for the City of Cleveland, and Jamison is his Executive Assistant. Defendants desire to communicate about their work in their official capacities. Therefore, the parties jointly request the that the terms of Defendants' release be modified as follows:

1. Johnson and Jamison shall avoid all contact, directly or indirectly, with any person who is or may be a victim or witness in the investigation or prosecution, or with codefendants, except that:
 - a. Johnson, in his capacity as Councilperson, and Jamison, in his capacity as Executive Assistant to Johnson, may discuss with each other legislative, budgetary, and other matters related to the official business of their positions for so long and both maintain their positions; and
 - b. Johnson and Jamison may discuss matters related to this case with each other in the presence of their attorneys.

To ensure compliance with the terms of the proposed modification, Defendants agree to make their telephone records, including call details and text messages, available to the Pretrial and Probation Department upon request.

Respectfully submitted,

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